

Andrew 7045  
Cole 5924

## A few cost effectiveness numbers

4 messages

Emily Schilling &lt;ECSchilling@hollandhart.com&gt;

Thu, Aug 22, 2013 at 3:12 PM

To: "Tim Brown (Tim.Brown@solvay.com)" &lt;Tim.Brown@solvay.com&gt;

Tim, here are some bullet points pulled from a comment document. The Deseret Power Plant permit to construct has some helpful examples. These are much lower numbers than Wyoming is asserting is cost effective; note that Wyoming looked at incremental costs for Basin Electric's Dry Fork Project.... That might be worth a look, too. Let me know how I can be of help! Emily

- North Dakota found that an incremental cost effectiveness of \$2,609 for NO<sub>x</sub> control was not cost effective at an ethanol plant. NDDH Response to Nat'l Parks Conserv. Ass'n Comments at 18. (Docket No. EPA-R08-OAR-2010-0406-0026).
- Pennsylvania found that an overall cost effectiveness of \$5,764/ton for SO<sub>2</sub> control was excessive for BACT. *Deseret Power Elec. Coop. Bonanza Power Plant*, PSD Permit to Construct Final Statement of Basis for Permit No. PSD-OU-0002-04.00, at 36 (Aug. 30, 2007). Exhibit 45.
- Nebraska found \$5,900/ton incremental cost effectiveness for SO<sub>2</sub> control to be excessive for BACT. *Deseret Power Statement of Basis* at 34.
- Nebraska found \$5,600/ton incremental cost effectiveness for NO<sub>x</sub> control and \$6,700/ton incremental cost effectiveness for SO<sub>2</sub>/H<sub>2</sub>SO<sub>4</sub>/HF control to be excessive for BACT. *Deseret Power Statement of Basis* at 34.
- Pennsylvania has indicated that an incremental cost effectiveness value of \$5,000/ton SO<sub>2</sub> removed is "economically infeasible." *Deseret Power Statement of Basis* at 35.
- Wyoming selected SCR as BACT for NO<sub>x</sub> control but rejected more stringent emissions limits at Basin Electric's Dry Fork Station project due to incremental costs, even though the average cost effectiveness at the more stringent levels was \$1,751 - \$2,004/ton NO<sub>x</sub> removed. *Id.* at 36.

**Emily C. Schilling**

Holland & Hart LLP  
975 F Street NW, Ste. 900  
Washington, D.C. 20004  
Phone (202) 654-6922

Cell (202) 725-0528

E-mail: [ecschillingl@hollandhart.com](mailto:ecschillingl@hollandhart.com)**SOLVAY2016\_1.2\_004535**



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**Brown, Tim** <tim.brown@solvay.com>

Thu, Aug 22, 2013 at 3:19 PM

To: Tim Martin <tmartin@airsci.com>, Rodger Steen <rgsteen@airsci.com>, Todd Brichacek <Todd.Brichacek@solvay.com>, Jim Phillip <Jim.Phillip@solvay.com>

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FYI-Here's some interesting info I received from Holland and Hart.

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Tim Brown  
Environmental Services Supervisor  
(307) 872-6570  
[tim.brown@solvay.com](mailto:tim.brown@solvay.com)

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**Brown, Tim** <tim.brown@solvay.com>

Thu, Aug 22, 2013 at 3:19 PM

To: Emily Schilling <ECSchilling@hollandhart.com>

Thanks Emily!

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Tim Brown  
Environmental Services Supervisor  
(307) 872-6570  
[tim.brown@solvay.com](mailto:tim.brown@solvay.com)

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**Brown, Tim** <tim.brown@solvay.com>

Thu, Aug 22, 2013 at 3:34 PM

To: Emily Schilling <ECSchilling@hollandhart.com>

I guess I should include the attachment this time!

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3/26/13

Solvay Mail - A few cost effectiveness numbers

Tim

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**BACT responses.pdf**

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